

Ref: 034-St Marys-RFI Response

3 March 2020

Director, Social and Infrastructure Assessments
Department of Planning, Industry & Environment
320 Pitt Street
Sydney NSW 2000

Attention: Dominic Crinnion

Dear Dominic,

Response to Penrith City Council Submission for St Marys Intermodal (SSD-7308)

I refer to Penrith City Council's letter dated 26 February 2020 providing further comments for consideration by the Department of Planning Industry & Environment in finalising assessment of the St Mary's Freight Hub, State Significant Development reference SSD-7308. On behalf of Pacific National, we offer the following information and response regarding Council's letter.

We note that Penrith Council has considered the supplementary information provided on 14 February 2020 in the form of a presentation on the findings of the Heavy Transport and Vehicle Analysis, incorporating a detailed transport route analysis and Road Safety Audit, which was submitted to the Department in January 2020. We understand these documents were forwarded to Penrith Council for review shortly after they were received by the Department.

The meeting at Council offices between the Department, Penrith City Council and Pacific National and its consultant team on 14 February 2020 was a welcomed opportunity to present specific detail on:

- heavy vehicle traffic generation,
- transport route selection, and
- the approach to traffic and public safety to be implemented for the St Marys Freight Hub.

We believe the meeting was an important step in our continued consultation with key stakeholders and progressing the assessment towards approval. It was also pleasing to hear senior officers from Council confirm at the meeting that Penrith City Council is not objecting to the proposal.

Enclosed is a table summarising Council comments outlined in their latest letter and we offer a respective reply for consideration by the Department (see Attachment 1).

We trust our response to the Council comments clarifies the detail and facts regarding the intended use of roads within the surround road network by heavy vehicles from the St Marys Freight Hub.

The information in this letter and attachment completes our response to the Penrith City Council letter. We are again grateful for the opportunity to further respond to submissions on the St Marys Freight Hub project and, on behalf of Pacific National, we respectfully request that final assessment of the proposal progress to enable development approval.

If you have any questions or wish to discuss this further, please contact me on 0437 737 358.

Yours faithfully

A handwritten signature in black ink that reads 'Leigh D Cook'.

Leigh Cook
Project Director
Pacific National Pty Ltd

Response to Penrith Council Comments under 'Traffic Management Matters' in letter dated 26 February 2020

Penrith City Council Comment	Pacific National Response
<p><u>Road Network Access</u></p> <p><i>As has been Council's consistent position and recommendation, heavy vehicle traffic generated by this development should ideally be directly connected to the arterial road network. In addition, the arterial road network should be upgraded to accommodate the increased heavy vehicle traffic generation from this development and have regard to the potential for any future stages/expansion. Any proposed or required connections to Christie Street should include the upgrade of Christie Street and connections to Dunheved Road, the future Werrington Arterial Stage 2 (to be constructed by TfNSW), Forrester Road and additional connections to the proposed Outer Sydney Orbital. This is ultimately a factor to inform establishment of site suitability and Council appreciates that this is a matter for the Department to determine.</i></p>	<p>The St Marys Freight Hub does not intend or propose to use Christie Street, Werrington Road or any future arterial upgrade as a transport route.</p> <p>To use these roads would transport freight in the opposite direction with customers located in Eastern Creek, Erskine Park, Kings Park and Arndell Park.</p> <p>Using Christie Street and Werrington Road would add heavy traffic to roads already experiencing significant capacity and functional issues and constraints and add substantial increases in truck kilometres and greenhouse gas emissions.</p> <p>It is noted Council appreciates the road network issue is a matter for DPIE to determine.</p>
<p><u>Traffic Generation Impacts</u></p> <p><i>There are a number of SIDRA outputs (Option 4 PM Peak 2030) that proposed / include traffic generation rates and movements with Levels of Service (LoS) at C, D and F with long queue lengths and these include:-</i></p> <ul style="list-style-type: none"> - Glossop St / Forrester Rd being over 344m - Mamre Rd / M4 being over 259m, 304m and 569m - Great Western Highway / Carlisle Ave being over 277m - Great Western Highway / Glossop St being over 186m, 192m and 209m - Great Westyern Highway / Mamre Rd / Queen St, being at LOS F with queue lengths over 197m and 404m. <p><i>The SIDRA outputs (Option 4 AM 2030) still provide movement queues as follows:-</i></p> <ul style="list-style-type: none"> - Forrester Rd and Glossop St at over 278m - Great Western Highway / Carlisle Ave at LoS F, - Great Western Hiughway / Glossop St at LoS D coupled with movement queues over 230m - Great Western Highway / Queen St / Mamre with LoS D and F coupled with movement queues over 284m and 355m. 	<p>Note.</p> <p>Note.</p>

Penrith City Council Comment	Pacific National Response
<p><i>Despite these identified impacts, the application relies on upgrades at key intersections to be delivered by another developer (Lend Lease) through separately negotiated and executed VPA works. The timing and delivery of these works are outside the control of the current applicant however the current proposal also seeks to rely on other intersection upgrades, such as Glossop St / Great Western Highway which are not proposed as part of any executed VPA and are not proposed to be undertaken as part of this application, despite reliance on their implementation to support the modelled traffic generation rates.</i></p> <p><i>If the Department is accepting of the proposed site location having regard to site suitability considerations and access, then it is strongly recommended that any favourable determination include conditions of consent requiring intersection upgrades at key locations including, but not limited to, Queen St / Mamre Rd, St Marys and Glossop St / Forrester Road, St Marys.</i></p>	<p>The proposed development does not rely on any upgrades to be delivered by Lendlease. The Lendlease upgrades were assumed to be completed for the purposes of future year modelling only.</p> <p>The upgrade requirements are broad network-wide concerns on TfNSW Classified Roads, which are not council roads. The impacts generated by the proposed development are marginal and do not warrant upgrades from the proposal in isolation of the broader issue.</p> <p>The extensive traffic assessment and reporting submitted for the proposal demonstrates that additional traffic generated by the St Marys Freight Hub does not require any road upgrades except for minor upgrading requirements for the northbound lane in Forrester Road at the intersection with Glossop Street.</p>
<p><u>Other Traffic Management Design Requirements</u></p> <p><i>The following other matters are identified for the Department to consider prior to determination, or as otherwise addressed through recommended conditions of consent:-</i></p> <ul style="list-style-type: none"> <i>• The car park entry / exit should be separate from the heavy vehicle entry / exit driveways.</i> <i>• Separate accessible pedestrian access is to be provided from the footway and the car park to the building entrance in accordance with AS 2890 car park access and AS 1428 Mobility accessible paths of travel.</i> <i>• The access driveway widths must accommodate swept movements of the largest vehicle servicing the site and be designed to conform with AS 2890.2.</i> <i>• Sight distance requirements and driveway widths are to be met in accordance with AS/NZS 2890.1: 2004 and Council requirements. This is to include the requirements set out in AS 2890.1 Figure 3.2 Sight Distance Requirements at Driveways and Figure 3.3 Minimum Sight Lines for Pedestrian Safety. Also AS 2890.2 Figure 3.3 Sight Distance Requirements at Access Driveway Exits and Figure 3.4 Minimum Dimensions for Access Driveway Sight Plays for Pedestrians.</i> <i>• The required sight lines around the driveway entrance and exit are not to be compromised by street trees, landscaping, fencing or signposting.</i> 	<p>The recommended conditions are noted and no further comment.</p>

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<ul style="list-style-type: none"> • <i>All car parking and manoeuvring must be in accordance with AS 2890.1, AS 2890.2, AS 2890.3, AS 2890.5, AS 2890.6 and Council requirements.</i> • <i>All car spaces are to be sealed/line marked and dedicated for the parking of vehicles only and not be used for storage of materials/products/waste materials etc.</i> 	